REMARKS

Reconsideration of the present application as amended is respectfully requested. Claim 27 has been canceled. Claims 1-26 are currently pending. Applicant wishes to thank the Examiner for the courtesies extended in the interview of February 2, 2004. Claims 1-26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,848,373 to DeLorme et al. ("DeLorme '373") in view of U.S. Patent No. 6,321,158 to DeLorme et al. ("DeLorme '158") and U.S. Patent No. 5,416,312 to Lamoure ("Lamoure").

Independent claim 1 is directed to "[a] system for retrieving position-related information comprising a map, including: a representation of a particular geographical area, and an address pattern comprising a pattern of dots disposed throughout said representation of the particular geographical area, wherein each specific geographical location within the geographical area is associated with a unique portion of the address pattern and can be identified from the associated unique portion of the address pattern." The system further includes "an electronic reading device including a reading sensor for optically detecting a portion of the address pattern," and "a server for identifying a specific geographical location corresponding to the detected portion of the address pattern."

DeLorme '373 describes a computer aided map location system that provides correlation and coordination of spatially related data between a computer, such as a personal digital assistant (PDA), a portable personal computer (PC), or electronic computer (EC), and a set of printed maps. DeLorme '373 describes each map of the set of maps as incorporating grid lines that define boundary lines of grid quadrangles identified by unique names. DeLorme '373 describes that the PDA/PC/EC is programmed to display an image of at least one selected grid quadrangle identified by unique name by displaying the boundary lines of the grid quadrangle for correlation with a corresponding grid quadrangle on the printed map. DeLorme '373 further describes that the unique grid name is also displayed for selection of the correct similarly named corresponding grid printed map (See Delorme '373, column 8, lines 41-61).

The Office Action appears to equate the printed map and grid system as described by DeLorme '373 with "a map including a representation of a particular geographical area" (referring to column 3-4, lines 55-14 of DeLorme '373) and an address pattern "wherein each

specific geographic location within the geographic area is associated with a unique portion of the address pattern" (referring to columns 4-5, lines 13-17, columns 7-8, lines 42-65, and column 50, lines 12-58 DeLorme '373) as found in claim 1. In addition, the Office Action asserts that DeLorme '373 describes "many form of the address pattern", referring to column 50, lines 12-23 as describing grid "hash marks" in pixel form. The Office Action further asserts that from the cited portion of DeLorme '373 "it is obvious that an address pattern can be a dot pattern." However, the cited portion of DeLorme '373 describes graphic display routines for drawing features, such as grid quadrangles and grid "hash marks" in pixel form, on an electronic display. Applicant submits that there is no teaching or suggestion that these grid "hash marks" are representative of an optically-detectable address pattern as found in claim 1.

The Office Action further refers to columns 62-64, lines 59-7 of DeLorme '373 as describing an electronic reading device for optically detecting a portion of an address pattern. On page 9 of the Office Action, it is asserted that column 63, line 65 to column 64, line 2 of DeLorme '373 disclose "optically detecting a portion of the address pattern," and that the "location of accident in a grid quadrangle is represent an address pattern, and a handheld scanner represent optically detecting a portion of an address pattern in the claim invention." Applicant respectfully disagrees with the interpretation in the Office Action of the cited portions DeLorme '373. The cited portions of DeLorme '373, as illustrated in Figs. 14E and 14F, describe the marking of a location of an accident with a pen or pencil on a map encoded with grid quadrangles for identifying the location of the accident by gridname, and then later using a handheld scanner to digitize the geocoded accident location into a CAMLS computer system so that the accident scene and geographical location can be displayed on a computer display.

Column 64, lines 6-7 of the cited portion of DeLorme '373 describe this procedure as "an example of steps 357 and 361, of TABLE I and step 371 of TABLE II." Step 357 is described in column 42, lines 34-50 of DeLorme '373 as "an array of conversion routines for conversion of raster data consisting of mapping graphics and related text, derived from input devices such as scanned in paper maps, message pads, digitizing tables, graphics and CAD programs, fax and wireless data transmissions into standard CAMLS data structures." DeLorme '373 describes that "these conversion routines read standardized, pre-defined CAMLS symbols and markings easily made by handheld pencil, pen, or the equivalent digital pen or mouse or

drawing device. Such symbols may include an X inside a circle representing a freshly geocoded site, or an H within a box as a hand-writable and digitally readable convention for hotel, certain kinds of dotted lines or double lines as political boundaries versus roads, etc." DeLorme '373 further describes that "[t]his facilitates geocoding and making other map annotations on printed paper maps for later scanning into CAMLS software as well as receiving input from pen-pad type digital devices." Step 371 is described in column 44, lines 40-45 of DeLorme '373 in that "CAMLS printed maps can also be annotated or marked at the remote site by hand using standard symbols and terms that CAMLS software can recognize," and "the maps are thereafter transported to, and scanned into, a CAMLS software equipped computer device."

The aforementioned sections of DeLorme '373 describe the reading of symbols and markings made on printed paper maps in order that they may be converted into CAMLS data structures. DeLorme '373 contains no teaching or suggestion that a location of an accident in a grid quadrangle is representative of an address pattern. As previously described, in DeLorme '373 a particular grid quadrangle is identified by a unique gridname. Applicant submits that there is no teaching in the cited portions of DeLorme '373 that the grid quadrangles are optically detected, much less that they represent an optically detected address pattern. Applicant respectfully submits that there is no teaching or suggestion in DeLorme '373 of the feature of claim 1 of "an electronic reading device including a reading sensor for optically detecting a portion of the address pattern."

The Office Action has attempted to rely upon Lamoure to overcome deficiencies of DeLorme '373. In particular, the Examiner has referred to Lamoure as describing "an address pattern comprising a pattern of dots disposed throughout representation of a particular geographical area" (referring to the abstract; column 2, lines 14-60; columns 3-5, lines 39-14; columns 5-6, lines 60-24; and columns 6-7, lines 44-4 of Lamoure). Applicant submits that there is no motivation to one of ordinary skill in the art to combine the teaching of DeLorme '373 and Lamoure. On page 9 of the Office Action, it is asserted that "it is reasonable to combine these [two] references because, in columns 63-64, lines 65-2, [DeLorme '373] disclose a handheld scanner is used to digitize the geocoded accident location (in the grid quadrangle) into a computer system, therefore, [DeLorme '373] disclose optically detecting a portion of an address pattern." The Office Action further asserts that Lamoure discloses in column 3, lines

39-45 (geographic areas are composed of dots), and each group of dots being readable by optical reading (last 4 lines of the abstract)." The Office Action further asserts that "[t]herefore it is reasonable to combine [DeLorme '373], and Lamoure to modify that an address pattern can be a dot pattern or a grid pattern." However, as previously discussed, there is no teaching or suggestion by DeLorme '373 of using an electronic reading device to optically detect a portion of an address pattern. Thus, Applicant submits that one of ordinary skill in the art would not be motivated to combine the teaching of Lamoure with those of DeLorme '373.

The Office Action has further attempted to rely upon DeLorme '158 to overcome deficiencies of DeLorme '373 and Lamoure. In particular, the Office Action cites column 8, lines 12-67 of DeLorme '158 as describing "a server for identifying a specific geographic location corresponding to the detected portion of the address pattern." On pages 9-10 of the Office Action, it is asserted that column 12, lines 31-34 of DeLorme '158 disclose "the IRMIS, as embodiment in DeLorme's SOLUS software, provides a mapping or geographic information system application and data for use on such PDAs." It is further asserted that column 12, lines 40-44 of DeLorme ;158 disclose "the user can mark particular locations using the stylus," and that column 8 of DeLorme '158 discloses "the software can be run on a central server." It is asserted in the Office Action that "therefore, it is obvious that [DeLorme '158] discloses optically detecting a portion of an address pattern and using server to identify a specific geographical location corresponding to the detected portion of an address pattern."

The cited portion of DeLorme '158 describes a communication interface between a personal digital assistant (PDA) and a desktop computer to facilitate transfer of geographic data therebetween. An example is described in which information such as location marks can be recorded on the PDA at a remote location, and then transferred into the desktop computer. However, there appears to be no teaching or suggestion in DeLorme '158 of optically detecting a portion of an address pattern and using a server to identify a specific geographical location corresponding to the detected portion of the address pattern. In the cited portion of DeLorme '158 the stylus is described and illustrated in Figure 1A1 as being for use with the touchscreen of a PDA device. For example, column 12, lines 26-29 of DeLorme '158 describe that "[s]uch touchscreens can be actuated at particular points and/or series of points by touching, tapping, or sliding on the screen with a stylus, or the equivalent of a pen or pencil point." Applicant submits

that the stylus of DeLorme '158 functions to apply physical pressure to the surface of a touchscreen in a PDA, not to optically detect an address pattern. For at least the foregoing reasons, Applicant respectfully submits that independent claim 1 distinguishes over DeLorme '373 in view of DeLorme '158 and Lamoure and requests that the 35 U.S.C. 103(a) rejection of claim 1 be withdrawn.

Independent claim 14 describes a method for retrieving position-related information. The method includes the step of "optically detecting a selected position on an address pattern with an electronic reading device, said address pattern comprising a pattern of dots, said pattern of dots disposed throughout a representation of a geographical area and wherein said selected position can be determined from a detected portion of the address pattern that is near the selected position." The method further includes the steps of "sending an indication of the selected position from the electronic reading device to a server," and "identifying a geographical location within said geographical area that corresponds to the selected position."

The Office Action indicates that claims 14-16 have been rejected for the same reasons as claims 1-3 were rejected. Despite the differences between claims 1 and 14, for similar reasons as those discussed with respect to independent claim 1, Applicant submits that the cited combination of DeLorme '373 in view of DeLorme '158 and Lamoure fails to teach or suggest the feature of claim 14 of "optically detecting a selected position on an address pattern with an electronic reading device, said address pattern comprising a pattern of dots, said pattern of dots disposed throughout a representation of a geographical area and wherein said selected position can be determined from a detected portion of the address pattern that is near the selected position." Applicant respectfully submits that independent claim 14 distinguishes over DeLorme '373 in view of DeLorme '158 and Lamoure and requests that the 35 U.S.C. 103(a) rejection of claim 14 be withdrawn.

Claims 2-13 and 15-26 are dependent upon and further limit their respective independent claims 1 and 14. For at least the reasons as discussed with respect to independent claims 1 and 14, respectively, Applicant respectfully submits that claims 2-13 and 15-26 also distinguish over DeLorme '373 in view of DeLorme '158 and Lamoure, and requests that the 35 U.S.C. 103(a) rejection of claims 2-13 and 15-26 be withdrawn.

Claim 27 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Lamoure and obviousness. Applicant has canceled claim 27, rendering the rejection of claim 27 moot.

In view of the above, each of the presently-pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

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Respectfully submitted,

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